







Issue	What SES needs	Current compromise	Outcome
<p>Performance Review Body (PRB)</p> 	<ul style="list-style-type: none"> <li>▪ A “new” PRB with enlarged scope and greater competency for action.</li> <li>▪ A PRB that is fully independent.</li> <li>▪ A PRB that has the power to regulate and enforce reforms on capacity, costs and environment.</li> </ul>	<p>A “new” PRB with limited scope and which does little to change status quo.</p> <p>The “new” PRB cannot evolve.</p> <p>States will have more opportunity to influence the PRB and reduce the chance of actual improvements.</p>	<p>An impotent PRB</p>
<p>National Supervisory Authorities (NSA)</p> 	<ul style="list-style-type: none"> <li>▪ Properly resourced, completely independent and competent NSAs.</li> <li>▪ Empowered to take decisions without any external influence.</li> <li>▪ A regulatory framework the ensures a harmonised approach and implementation.</li> </ul>	<p>Locks in the current limited role and scope of NSAs e.g. in performance planning whilst only partially accepting their independence.</p> <p>Supervisory authorities (NSA and/or PRB) do not have enforcement power.</p> <p>States can determine targets and deviate from these targets as they wish.</p> <p>More complexity for coordination and consultation rather than improving flexibility and speed of adaptation to change.</p>	<p>Limited improvements which overall falls below status quo</p>

Issue	What SES needs?	Current compromise	Outcome
<p>Targets and performance</p> 	<ul style="list-style-type: none"> <li>▪ The Collaborative Decision Making (CDM) processes result in agreed and binding targets.</li> <li>▪ Meaningful consultations with reliable results and clear accountability.</li> <li>▪ Ambitious targets.</li> </ul>	<p>Failure to ensure commitment to ambitious targets.</p> <p>Enables easier backtracking on agreed and legal targets without consequences.</p> <p>Effective regulatory oversight reduced.</p>	<p>Worse than status quo</p>
<p>Principles for Charges</p> 	<ul style="list-style-type: none"> <li>▪ Clear definition of the cost base for future charges.</li> <li>▪ Charges to be based upon cost efficient service provision: taking into account monopolistic structures.</li> <li>▪ Principles for charges to only apply to ANSPs; not used to reduce emission by airlines.</li> </ul>	<p>Locks in the current situation for the foreseeable future.</p> <p>Limits the ability to change and adapt to an evolving Air Traffic Management and aviation environment as well as to new financing requirements.</p> <p>Modulation of charges or common unit rate will both lead to higher cost and complexity without the desired reduction in emissions.</p>	<p>Worse than status quo</p>

Issue	What SES Needs	Current compromise	Result
<p>Network management (NM)</p> 	<ul style="list-style-type: none"> <li>▪ Collaborative decision-making with stakeholders.</li> <li>▪ A clear allocation of roles, responsibilities and accountability at all levels.</li> <li>▪ To ensure that airlines can implement efficient flight plans.</li> <li>▪ To identify causes for inefficiencies and ensure airlines are accountable only for what they control.</li> </ul>	<p>Maintains current situation and removes flexibility.</p> <p>No actual changes in allocation of roles and responsibilities.</p> <p>Favours “shortest routes” over efficient trajectories, increasing airline fuel use and emissions.</p>	<p>Worse than status quo</p>
<p>Environment</p> 	<ul style="list-style-type: none"> <li>▪ To focus on increasing ATM system efficiency.</li> <li>▪ To ensure that benefits of improved/disruptive technologies can materialize.</li> <li>▪ To support airlines and the aviation industry in achieving their ambitious environmental goals.</li> </ul>	<p>Introduces a “climate and environment” category without any further definition which creates avoidable complexity and “promotes” inconsistencies.</p> <p>Provides no incentive for States/ANSPs to collaborate or enhance capacity and reduce delays.</p> <p>Tries to enforce airline decarbonisation using a regulation designed for ANSPs.</p>	<p>Does not achieve original targets linked to capacity and environment</p>